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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA**

IN RE:

INCREDIBLE AUTO SALES L.L.C.

Debtor

Case No. 06-60855-RBK

Judge Ralph B Kirscher

A Chapter 11 Proceedings
For Reorganization

**DEBTOR'S RESPONSE, RESISTANCE AND OBJECTION TO
MOTION FOR RELIEF FROM THE STAY FILED BY STEVE'S AUTO**

NOW COMES the Debtor Incredible Auto Sales L.L.C. and Responds, Resists
and Objects to the Motion for Relief from the Automatic Stay as filed by Steve's Auto.

IN SUPPORT hereof, the Debtor states as follows:

- 1.) All matters including matters relating to Steve's Auto, and the other auction entities have been continued for hearing based on Debtor's understanding to December 5, 2006 at 10:00 A.M. in Butte, Montana.
- 2.) These Auto Auction matters have been treated to date by this Court together. They should not be tried piecemeal. The facts are basically the same.
- 3.) The Debtor has offered to sell these vehicles in the normal course of business and turnover auction proceed funds as directed.
- 4.) These vehicles, whether paid for or not constitute an asset of this Debtors estate.
- 5.) The Auctions as well as Steve's Auto are not secured creditors, but unsecured claimants holding unsecured pre petition claims.
- 6.) This Court has previously addressed these Auction vehicles and has sought a consent agreement between the parties including Hyundai, whose secured assets include these vehicles- No agreement to date has been reached.
- 7.) Piecemeal settlement of these Auction vehicles makes no sense and is costly.
- 8.) No basis exists now at this time to grant this Motion to Steve's Auto or treat Steve's Auto different from the other Auction Parties.
- 9.) The Debtor Resists and Objects to this Motion and requests a hearing.

WHEREFORE the Debtor Resists and Objects to the Steve's Auto Auction's Motion for Relief and requests a hearing at the next available date on 12/5/06 at Butte, Montana at 10:00 A.M. as now scheduled.

November 27, 2006

/s/ William L. Needler
Attorney for the Debtor
Incredible Auto Sales L.L.C

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NOTICE OF RESPONSE

PLEASE TAKE NOTICE, that on Tuesday December 5, 2006 at 10:00 A.M. that the attached Response, Resistance and Objection to the Motion of Steve's Auto Auction for Relief from the Automatic Stay will be heard before Judge Ralph B. Kirscher at the United States Bankruptcy Court for the District of Montana, 400 North Main Street, 2nd

Floor, Butte, Montana. (A copy of the Response, Resistance and Objection and Notice are attached.)

/s/ William L. Needler
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PROOF OF SERVICE

William L. Needler, an attorney, certifies that he filed this Objection on November 27, 2006 with the Clerk of the above Court via CM/ECF electronic filing and the persons listed by the Court were served electronically.

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This Attorney also certifies that he also caused to be served, a copy of the above Objection and Notice as attached hereto, to the persons listed below served by Facsimile Service from the Attorneys offices on November 27, 2005.

/s/ William L. Needler
William L. Needler

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